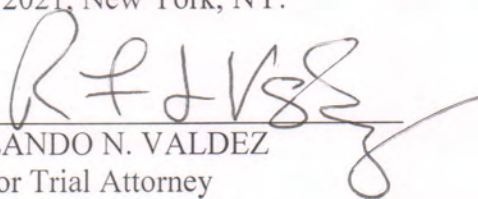


DECLARATION OF ROLANDO N. VALDEZ

I, ROLANDO N. VALDEZ declare under penalty of perjury that the following is true and correct:

1. I make this declaration based upon my personal knowledge of the facts and also upon information and belief having reviewed official files of the U.S. Department of Labor.
2. I make this declaration in support of the Secretary of Labor's Petition to Enforce Administrative Subpoena.
3. I am employed by the U.S. Department of Labor, Office of the Solicitor as a Senior Trial Attorney. My duty station is located at 201 Varick Street, Room 983, New York, New York 10014.
4. I have reviewed communications between the Secretary's representatives and CSG as well as CSG's counsel. To date and concerning the administrative subpoena at issue in this petition, CSG has not provided the Secretary with information or explanation about its assertions of the attorney-client privilege or work product doctrine.
5. I have also reviewed the Secretary's prior filing in *Harris v. Jacobson*, 13-MC-213 (JPO) (S.D.N.Y) and I submit that Attachment A to this Declaration is a true and accurate copy of the transcript of the August 6, 2013 Motion Hearing concerning the Secretary's Petition to Enforce Administrative Subpoenas.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 16th day of March 2021, New York, NY.



ROLANDO N. VALDEZ
Senior Trial Attorney
U.S. Department of Labor